

Cobb, Marione M.
Louisa, VA
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Twin Oaks Community
138 Twin Oaks Rd.
Louisa, VA 23093

February 23, 2001

Gary Hartman, U.S. Dept. of Energy, Oak Ridge, Tn. 37831
Fax # 865-576-1237

Mr. Hartman:

As a taxpayer who will be expected to financially support the new Oak Ridge nuclear facility, I wish to express my negative opinion of this proposal.

1. The US does not need 6,000 nuclear weapons --we do not need any. The Russian duma has ratified the START 2 Treaty committing them to reduce their stockpile below 6,000. Russia and the US have agreed in principle to much smaller stockpiles in the first rounds of START 3 negotiations. The US military has petitioned Congress for authority to reduce our nuclear stockpile, estimating that we can save \$9 billion a year if we retire unusable and unneeded missiles currently deployed. Russia's President Vladimir Putin has called for deep arsenal reductions below the 1,500 missile level. US President George Bush campaigned on a platform that included unilateral cuts in nuclear weapons (he agrees we don't need the nukes for security). And General Lee Butler, former head of NATO's nuclear forces, has called for arms reductions leading to abolition, along with dozens of military and political leaders from around the world.

1/16

2. There is a history of negative environmental impact from Y-12, according to the Environmental Impact Statement. In 1998, with the plant operating at 10% capacity (nearly shut down), Y-12 pumped 96,00 pounds of hydrochloric acid into the air, and eleven pounds of lead, and almost 300 pounds of nitric acid. Steam from the Y-12 plant included 2,500 tons of sulfur dioxide, 22 tons of carbon monoxide, 31 tons of unidentified "particulate matter", 1,300 tons of nitrogen oxides, and more than two tons of volatile organic compounds. In 1999, the top three reading for ozone exceeded standards. Groundwater to the west has been contaminated by hazardous chemicals, and the aquifers below Y-12 are contaminated with nitrates, solvents, radionuclides and metals. Groundwater to the east contains volatile organics, fuel components like benzene and toluene, radionuclides, and metals (boron, beryllium, cobalt, copper, chromium, lead, lithium, mercury, manganese, nickel and uranium). Out of 413 water samples tested in 1998 for mercury, 408 exceeded the state's water quality criteria.

2/07

At the EIS hearing in Oak Ridge on 1/25/01 a speaker stated "To move ahead with exorbitant spending for a new bomb plant denies basic human needs (in this country)". Let us not engage in an "arms race against ourselves."

What Y-12 does need is new facilities for dismantling nuclear weapons, processing and storing highly enriched uranium in non-weapons usable forms until it can be disposed of, and allowing for international inspection with nothing to hide and safeguarded from attack.

1/16
(cont.)

The facts appear self-evident. I pray that political self-interest will not out-weigh them.

Sincerely,

Marione M. Cobb
Marione M. Cobb

Comment No. 1

Issue Code: 16

Parties to the Nuclear Nonproliferation Treaty agree not to directly or indirectly transfer nuclear weapons or other nuclear explosive devices or control over them to any recipient; and not to in any way assist, encourage, or induce nonnuclear weapon states to manufacture or alter use, or acquire nuclear weapons, or alter nuclear explosive devices or control over them. Continuation of the Y-12 mission, and construction and operation of a HEU Materials Facility or Special Materials Complex by the United States does not conflict with such an agreement. The proposed action, which includes continuing weapons dismantlement activities at Y-12, fully supports the goals of Article VI of the Nuclear Nonproliferation Treaty, in which signatory nations agree to work toward total disarmament. Since the end of the Cold War, the United States has significantly reduced the size of the nuclear weapons stockpile, and DOE has dismantled more than 15,000 nuclear weapons. At the present time, the United States is further downsizing the nuclear weapons stockpile consistent with the terms of the START I and the recently ratified START II.

Comment No. 2

Issue Code: 07

The amount of emissions released by the Y-12 site quoted by the commentor in the Draft SWEIS has been updated to 1999 data and included in the Final SWEIS. The amounts in many cases have been reduced (see Section 4.7.2.1 of the Final SWEIS). Regarding the sampling of mercury in Y-12 surface water and exceedance of state water quality criteria, the commentor is correct. However, sampling is performed as Best Management Practice and is above and beyond that required by the NPDES Permit. For nonradiological parameters that are sampled and detected above the analytical method reporting detection limit, the data are compared with Tennessee water quality criteria. The most restrictive of either the freshwater fish and aquatic life criterion maximum concentration or the "recreation concentration for organisms only" standard (10^{-5} risk factor for carcinogens) is used. This comparison serves as a record of water quality, and the comparison to state water quality criteria limits is for informational purposes only. The water quality criteria used is 0.00015 mg/L and the average concentration of 400 samples taken in 1999 was

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Comment No. 2 (cont.)

Issue Code: 07

<0.0007 mg/L (see Volume II, Section D.3.6 of the Final SWEIS for a discussion of mercury and potential health effects).

Over the past several years, DOE has had a very aggressive facility upgrade and site clean-up program and has worked with EPA, the states, stakeholders, and the general public to clean up its facilities and ORR to acceptable levels. To date, DOE has completed numerous clean-up activities and is aggressively working toward the cleanup of its remaining environmental problems.

DOE believes that it has adequately addressed impacts to the environment that could result from implementing the proposed action and alternatives in the Y-12 SWEIS. Volume I, Chapter 5, Section 5.7 of the Y-12 SWEIS addresses air quality impacts from the proposed action and alternatives; and Volume II, Appendices D and E provide further detailed analyses related to human health effects from normal operations/facility accidents and air quality, respectively.

Comment No. 3

Issue Code: 05

DOE believes that it has adequately addressed impacts to the environment that could result from implementing the various alternatives. Volume I, Chapter 4, Section 4.5.2 and Chapter 5, Section 5.5.2 of the Y-12 SWEIS addresses hydrological impacts of the proposed action and alternatives; and Section 3.2.2.3 explains the activities and actions that would continue under No Action - Planning Basis Operations Alternative for remediation of groundwater contamination at Y-12. In addition, there are no Class I sole source aquifers that lie beneath ORR.